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begin title of Court)

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

Case No. \_\_\_\_\_ – Civ (Judge's Last Name/Magistrate's Last Name)  
24-cv-61316-AHS

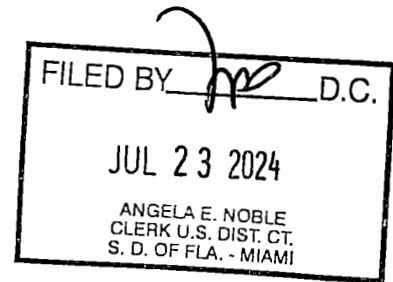
(Full Name of Plaintiff/s) \_\_\_\_\_,

Plaintiff(s) Gregory St. Clair

vs.

(Full Name of Defendant/s),

Defendant(s):  
Experian & Equifax



**COMPLAINT**

I, Gregory St. Clair, plaintiff, in the above styled cause, sue defendant(s): Experian & Equifax.

This action is filed under (indicate under which federal law or section of the U.S. Constitution this action is being filed): 12 CFR § 1022.142

Dated: Month, day, year

07-12-2024

Respectfully submitted,

Name of Filer

Attorney Bar Number (if applicable)

Attorney E-mail Address (if applicable)

Firm Name (if applicable)

Street Address

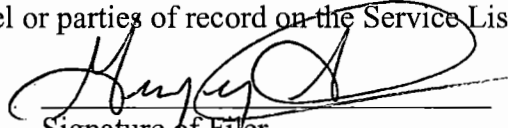
City, State, Zip Code

Telephone: (xxx)xxx-xxxx

Attorneys for Plaintiff/Defendant [Party Name(s)]  
(if applicable)

**Certificate of Service\***

**I hereby certify** that a true and correct copy of the foregoing was served by [specify method of service] on [date] on all counsel or parties of record on the Service List below.

  
\_\_\_\_\_  
Signature of Filer

\*: a Certificate of Service is only required if filed conventionally (not through CM/ECF). see Section 3K(4), CM/ECF NextGen Administrative Procedures.

**Complaint Against Experian and Equifax**

Subject: Complaint Against Experian and Equifax for Non-Compliance with Federal Law Regarding Human Trafficking Victim Protections

Plaintiff:

Gregory St Clair

Defendants:

Experian

Equifax

**Background:**

1. Victim of Human Trafficking:

From 2022 up until May 2024, I was a victim of human trafficking. During this period, my traffickers forced me to open accounts and acquire items in my name without any benefit to me.

2. Initial Submission of Documentation:

On January 31, 2024, I sent documentation to Experian to block the fraudulent information from my credit report as per the protections afforded to victims of human trafficking. This documentation included evidence from a certified NGO.

3. Denial and Lack of Action by Experian:

Experian denied my request, claiming that my NGO was not certified, significantly affecting my credit standing, creditworthiness, and mental state. During this time, I was still planning my escape from my traffickers.

**Complaint Against Experian and Equifax**

**4. Proof of NGO Certification:**

I subsequently provided additional documentation proving that my NGO was certified. Despite this, I received no response from Experian, specifically from Patricia Susoff and Travis Hutchinson, for months.

**5. Continued Trafficking and Fraudulent Activity:**

In March 2024, my traffickers forced me to take out a car loan in my name, from which I received no benefit and never saw the vehicle. This fraudulent tradeline appeared on my credit report, further damaging my credit.

**6. Escape and Subsequent Actions:**

In May 2024, I secured a \$10,000 personal loan, which enabled me to escape to Florida. Since then, I have submitted all required paperwork to both Experian and Equifax to have the fraudulent tradelines removed.

**7. Equifax's Inadequate Response:**

Equifax has repeatedly responded with a standard email stating I need a victim determination letter from a government agency, despite providing ample documentation proving my status as a trafficking victim.

**Impact:**

- The refusal by Experian and Equifax to delete tradelines associated with my human trafficking documentation has severely impacted my credit and creditworthiness.
- I have missed significant opportunities for loans and lines of credit for my business, hindering my ability to become a productive member of society.

**Complaint Against Experian and Equifax**

- The ongoing issues have caused me severe mental anxiety and anguish.

**Legal Grounds:**

- Both Experian and Equifax have violated federal law, which mandates that no consumer reporting agency can block information related to human trafficking based on the validity of the documentation.

**Relief Sought:**

- I am seeking damages of \$500,000 for mental anxiety, anguish, and the financial harm caused by their actions.

- Immediate removal of all fraudulent tradelines associated with my human trafficking documentation from my credit reports.

I request the court to take prompt action to address this complaint and provide the necessary relief.

Thank you for your attention to this matter.

**Attachments:**

1. Copies of all submitted documentation to Experian and Equifax
2. Proof of NGO certification
3. Correspondence with Experian and Equifax
4. Any additional relevant documents



## ALE-SERVICES

421 Broadway #5176 • San Diego, CA 92101

Contact@ALE-Services.com

(619) 363-1421

May 29, 2024

*Egertson and they ignored*

*Sample letter sent to Egertson*

NOTICE OF VIOLATION OF THE FAIR CREDIT REPORTING ACT; 12  
C.F.R. § 1022.142

*RE: GREGORY ST. CLAIR*

To Whom It May Concern:

Please be advised that our office has been retained by Gregory St. Clair, (Mr. St. Clair) in regard to his request to have information on his credit report blocked as a result of being Human Trafficking Victim, as defined in the Fair Credit Reporting Act Sections § 1002.142(b)(4)-(5) and § 1022.142(b)(7)). It is imperative that your organization take this letter seriously as my client presented valid documentation to prove their identity and status as a victim, and should have received the Block to the adverse information identified. Under the FCRA and Regulation V Human Trafficking Final Rule ("Final Rule" or "Rule"), you were required to block information from their credit report within four business days and failed to do so.

In his last attempt on May 13, 2024, my client, sent you a packet which enclosed Trafficking documentation that validly identified all requirements under § 1022.142(b)(6). (See Attached). Trafficking documentation means one or more documents that satisfy paragraphs (b)(6) where section (i) "Victim determination" can be fulfilled by submitting documents to comply with subsections A, B, or C; and (ii) "Identified adverse items of information" prepared by the consumer. (See below for exact wording of each section). Thus, requiring only two (2) specific documents that the victim needs in order to comply and have the information successfully blocked. However, they were denied without description of the procedure used to determine the outcome, stating that "The documentation you provided with your request does not satisfy the requirements which has been prescribed by 1022.142(b)(6)(i)(A)(2) and/or that they "lack valid Victim Determination" and/or the company required additional information necessary to complete your submission. In any event, it would appear that the overriding goal is to protect the rights of all people with whom you do business and not implicate this company from legal liability, by continuing to defy the provision in this law.



Documentation that is of a determination that a consumer is a victim of trafficking made by a (1) Federal, State, or Tribal governmental entity. As a member of the State Bar of California and an officer of the court, our firm has verified the identity and status of our client. Further and in support of section (2) as a non-governmental organization, members of the Bar have formal legal education as trained professionals and are generally in the best position to speak with a client, understand their personal background and history, and assess whether the consumer is a victim of trafficking. As such, the Victim Verification letter previously provided complies with the law and must be accepted as a valid victim determination and proof of identity. It is important to note that our client also provided his Driver's License, copy of his Social Security Number, a Utility Bill and Bank Statement. Most notably is the Notary Acknowledgement, where its entire purpose is to verify the identity of the individual that signed the document.

Secondarily, an in direct compliance with section (B), is a determination consisting of documents filed in a court of competent jurisdiction where a central issue in the case is whether the consumer is a victim of trafficking and the court has, at a minimum, affirmed the consumer's claim either by accepting certain pieces of evidence which are assumed to be true or finding that there is no genuine dispute as to any material fact supporting a judgment in favor of the victim as a matter of law. My client included the court document from Miami-Dade County Florida, titled "Agreed Order To Set Aside Final Judgment and Re-Close Case" regarding case No. 2022-016606-CC-25. The central issue regarding this case was actions taken by the victim's trafficker related to an unlawful lease taken out in my client's name. Failing to acknowledge this letter that more than satisfies this requirement, shows a lack of Good-Faith and by requesting further information it is a blatant violation of subsection (i), that states "A consumer reporting agency may not, however, ask for information on the validity of the facts or circumstances detailed in the contents of the submitted trafficking documentation establishing the consumer is a victim of trafficking or whether the identified adverse information resulted from a severe form of trafficking in persons or sex trafficking under paragraph (b)(6) of this section." A consumer reporting agency may only request additional information where the consumer reporting agency cannot reasonably confirm the appropriate proof of identity under paragraph (b)(1)

Regulation V requires consumer reporting agencies to develop and implement "reasonable" requirements for what information consumers shall provide to constitute proof of identity that are sufficient to enable the consumer reporting agency to match consumers with their files and adjust the information to be commensurate with an identifiable risk of harm arising from misidentifying consumers. (Section 1022.123). Furthermore, A consumer reporting agency may only decline and rescind a block when 1) the consumer reporting agency cannot reasonably confirm the consumer's appropriate proof of identity; 2) the consumer did not provide a victim determination; or 3) the consumer reporting agency cannot properly identify the adverse items of information. § 1022.142(e)(3)-(4)). The CRA's have a duty to review this information in good faith and the documents provided must be accepted as valid as my client has complied with the law, as referenced above.

The CRA's have a duty to understand the applications of this regulation have wide reaching implications that impact on the consumer, affect all aspects of their life and prevents them from moving on and becoming a productive member of society. Due to the fact that your company has denied my client's request, my client is entitled to damages. The appropriate remedy to compensate my client and comply with your legal obligations, includes:

- Block of all adverse information identified in the previously received Self-Attested Request for Blocking of Adverse Information.
- Lost opportunity damages in an amount equal to the credit he has been denied due to this information remaining on his credit report in the amount of \$100,000.00;
- Penalty damages for willful noncompliance with the Final Rule 1022.142(b)(6) and 1002.142(b)(2) regarding the blocking of adverse items in my credit report that are the result of human trafficking.

However, please be aware that we also reserve our right to report this company to the CFPB in which they are authorized to conduct investigations to determine whether any person is, or has, engaged in conduct that violates Federal consumer financial law. CFPB may bring administrative enforcement proceedings or civil actions in Federal district court, and can obtain "any appropriate legal or equitable relief with respect to a violation of Federal consumer financial law,"

We demand that this case not be closed until your company has taken the necessary steps to remove the items in question from my client's credit report which continues to wreak havoc on their credit profile / creditworthiness.

Please contact my office once you have reviewed this matter. In the event we are unable to reach an amicable resolution, we will have no option but to proceed with litigation. In the event legal action is required, my clients will seek damages to their credit profile, lost opportunity damages and punitive damages against this company for willfully violating the law against public policy and will seek any other remedies available. My clients are willing to do so in order to protect their rights, and the rights of others whom you may have harmed in the past or may harm in the future.

Thank you for your prompt consideration of this matter.

Regards,

*Caitlin Pettijohn*

Caitlin Pettijohn, Esq.

[Caitlin@ALE-Services.com](mailto:Caitlin@ALE-Services.com)

ALTERNATIVE LEGAL EDUCATION, LLC dba ALE-SERVICES  
A CALIFORNIA LIMITED LIABILITY COMPANY



**Victim Documentation - 1022.142(b)(6)**

**(i) Victim determination. Documentation that:**

- (A) Is of a determination that a consumer is a victim of trafficking made by a:
  - (1) Federal, State, or Tribal governmental entity; **or**
  - (2) Non-governmental organization or members of a human trafficking task force, including victim service providers affiliated with the organization or task force, authorized by a Federal, State, or Tribal governmental entity to make such a determination;
- (B) Is of a determination that a consumer is a victim of trafficking made by a court of competent jurisdiction or determination consisting of documents filed in a court of competent jurisdiction where a central issue in the case is whether the consumer is a victim of trafficking and the court has, at a minimum, affirmed the consumer's claim either by accepting certain pieces of evidence which are assumed to be true or finding that there is no genuine dispute as to any material fact supporting a judgment in favor of the victim as a matter of law; or
- (C) Is of a signed statement by the consumer attesting that the consumer is a victim of trafficking if such statement or an accompanying document is signed or certified by a representative of an entity described in paragraph (b)(6) (i)(A) or (B) of this section. .

**(ii) Identified adverse items of information.**

Documentation, which may consist of a statement prepared by the consumer or by any designated representative on behalf of a consumer (except for a credit repair organization as defined in section 403(3) of the Credit Repair Organizations Act, 15 U.S.C. 1679a(3), or an entity that would be a credit repair organization, but for section 403(3)(B)(i) of the Credit Repair Organizations Act, 15 U.S.C. 1679a(3)(B)(i)), that:

- (A) Identifies any items of adverse information that should not be furnished by a consumer reporting agency because the items resulted from a severe form of trafficking in persons or sex trafficking of which the consumer is a victim; and
- (B) Must contain a preferred method for a consumer reporting agency to contact the consumer electronically or in writing such as an email address or physical address where mail can be received. A consumer reporting agency shall use only the consumer's preferred method of contact for communications under paragraphs (d), (e), and (f) of this section about the consumer's submission and shall not use the consumer's preferred contact information for any other purpose.

**King County Safe Place**

Safe Place is a program that quickly connects runaway and homeless youth ages 12-17 to services, either by reuniting them with their family or providing them with emergency shelter. Youth can go to Safe Place site or call our **1-800-422-8336 (TEEN)** number, and Safe Place staff may be able to help.

Email [SafePlace@friendsof youth.org](mailto:SafePlace@friendsof youth.org).

**Support Groups**

GROUP	AUDIENCE	DATES	TIME	LOCATION
Recovery Circle	Female identified	Tuesdays	4:30 to 5:30 pm	In person (with safety measures) and via zoom. Contact <a href="mailto:mille.byrdlemon@seattleops.org">mille.byrdlemon@seattleops.org</a> or <a href="mailto:Martha.Linehan@SeattleOPS.org">Martha.Linehan@SeattleOPS.org</a>
Women's Empowerment Support Group	Female identified	Wednesday	4 to 5 pm	In person (with safety measures) and via zoom. Contact <a href="mailto:Martha.Linehan@SeattleOPS.org">Martha.Linehan@SeattleOPS.org</a>
Yoga	Female identified	Tuesday	3 to 4 pm	In person (with safety measures) and via zoom. Contact <a href="mailto:mille.byrdlemon@seattleops.org">mille.byrdlemon@seattleops.org</a> or <a href="mailto:Martha.Linehan@SeattleOPS.org">Martha.Linehan@SeattleOPS.org</a>
Survivor Support Group & Community Dinner	Female identified	Thursday	5 pm	In person (with safety measures) and via zoom. Contact <a href="mailto:rekina.perry@seattleops.org">rekina.perry@seattleops.org</a> & <a href="mailto:martha.linehan@seattleops.org">martha.linehan@seattleops.org</a>
OPS Youth Drop in DAY	Ages 11 to 24	Wednesdays	1 to 6 pm	Email <a href="mailto:ChelseaOlsen@seattleops.org">ChelseaOlsen@seattleops.org</a>

**Non-governmental / Community-based**

AGENCY	ADVOCATE	EMAIL	PHONE	REFERRAL
Advent Advocate Consulting	Dawn Jackson	<a href="mailto:support@adventadvocateconsulting.com">support@adventadvocateconsulting.com</a>	1.888.844.2107	Email or call advocate directly
API Chaya	Hao Nguyen	<a href="mailto:hao@apichaya.org">hao@apichaya.org</a>	206.325.0325 x 201	Email or call advocate directly
	Kyunghee Lee	<a href="mailto:kyunghee@apichaya.org">kyunghee@apichaya.org</a>	206.325.0325	Email or call advocate directly

Updated 5.10.2024



Gregory St Clair  
2104 Waterleaf Way  
Bowie, MD 20721

Dear Gregory St. Clair:

March 11, 2024

We are sending this final determination in response to the submission you sent to us requesting that we block certain adverse items of information on your personal credit report under the protections of the Fair Credit Reporting Act, section 605C (FCRA 605C).

This final determination is based on the completeness of your submission and any subsequent notifications of additional information that was needed to permanently block adverse items of information from your personal credit report under FCRA 605C.

We have completed our review of your submission and have determined the following:

- ☐ We were unable to block the items you requested due to the following reasons:
  - ☐ Experian was unable to validate the NGO for the required Victim Determination Documentation

If you disagree with our determination, you have the right to appeal or revise the determination you previously submitted. Send copies of any documents you wish to provide to us at Experian, P.O. Box 1069, Allen, TX 75013 **OR** Experian, P.O. Box 9701, Allen, TX 75013.

Always retain your original documents. You may also submit documents supporting your request electronically at [Experian.com/upload](https://www.experian.com/upload). We can only accept PDF or TIFF format for upload.

When you notify Experian of the request to block information from your credit report under the protections of the FCRA 605C, we will evaluate the submission in its entirety as required by law. We evaluate the completeness of your submission by considering the following documents:

**Proof of Identity**

- One copy of a government issued identification card, such as a driver's license, state ID card, or passport.



Gregory St. Clair  
2104 Waterleaf Way  
Bowie, MD 20721

June 12, 2024

Dear Gregory St. Clair:

We have received your request to block information from your credit report under the protections of the Fair Credit Reporting Act, section 605C (FCRA 605C).

Unfortunately, we cannot approve your request because:

We have determined that the victim determination documentation you provided is not valid. The documentation was either (1) made by an entity that is not authorized to make a victim determination under the federal rules implementing Section 605C of the FCRA, or (2) not an authentic document from an authorized entity. Our decision was based on some or all of the following: phone and/or email verification with the entity identified in the documents, comparison of documentation with government form templates and instructions, research regarding the entity identified in the documents, legal review of documentation, or other review of the authenticity of the documents.

If you disagree with this decision, you may resubmit your request to block, addressing the deficiencies noted above.

Send copies of any documents you wish to provide to us at Experian, P.O. Box 1069, Allen, TX 75013 **OR** Experian, P.O. Box 9701, Allen, TX 75013. Always retain your original documents. You may also submit documents supporting your request electronically at [www.Experian/upload](http://www.Experian/upload). We can only accept PDF or TIFF format for upload. You may also contact Experian at 1-833-420-2893 for assistance.

When you notify Experian of the request to block information from your credit report under the protections of FCRA 605C, we will evaluate the submission in its entirety as required by law. We evaluate the completeness of your submission by considering the following documents:

**Proof of Identity**

- One copy of a government issued identification card, such as a driver's license, state ID card, or passport.
- One copy of a utility bill, bank, or insurance statement.

Victim determination documents from one of following entities

- A Federal, State, or Tribal governmental entity, including a court in any of those jurisdictions.
- A Non-governmental organization (NGO) or human trafficking task force authorized by a Federal, State, or Tribal governmental entity to make such a determination; or
- a signed statement by the victim (you), which is also signed by, or accompanied by another document signed by, a representative from a governmental entity, court, authorized NGO or human trafficking task force.

Identification of adverse information

- Must identify the adverse information on your credit report that resulted from trafficking. This documentation should include a statement that identifies different debts or items on your credit file that were connected to, or were a result of, trafficking.

If we receive all required documents from you without deficiencies, we will block the identified items from your credit report within 4 business days of receipt of your completed submission and will send you the results with a copy of your Experian credit report. If we determine your submission is incomplete or contains deficiencies, we will notify you with the additional information that is necessary to complete any incomplete submissions or to correct any deficiencies within 5 business days of receipt of your submission to block any adverse items of information that resulted from trafficking. Whether or not we receive the additional information to correct the deficiencies from you, we must make a final determination of your request within 25 business days of the receipt of your original submission.

If you have complaints about the process, you may file a complaint about Experian or the company reporting the item, with the Consumer Financial Protection Bureau by visiting <https://www.consumerfinance.gov/complaint/> or by calling (855) 411-CFPB (2372). You can also contact your State Attorney General's office.

Sincerely,

Joy Allison  
Senior Regulatory Affairs Associate  
Experian Consumer Affairs  
833-420-2893



Equifax Information Services LLC  
P.O. Box 105874  
Atlanta, GA 30348

June 14, 2024

000003461 FEC20000061424136669 01 000000 009511 001

GREGORY STCLAIR  
2104 WATERLEAF WAY  
Bowie, MD 20721-2275



00003461 03461 0001-0001 DEC20000061424136674 00 L 00009511



000009512-FLT

4166534089-ME1-0d7c011100000f15-06142024

GREGORY STCLAIR  
2104 WATERLEAF WAY  
Bowie, MD 20721-2275

June 14, 2024



Confirmation # 4166534089

Re: FIRST Notice & Attempt to Resolve Deficiency with your request to block information due to Human Trafficking

Dear GREGORY STCLAIR,

We completed our review of your request to remove information from your Equifax credit file due to the information being the result of human trafficking.

Based on our review of your request and accompanying documents, the following additional information or documentation is necessary to complete your submission under section 605C of the Fair Credit Reporting Act and 12 C.F.R. 1022.142:

The victim determination documentation you submitted is not valid per the entity named on the document.

You did not provide sufficient documentation to confirm that you are a victim of human trafficking, which includes (1) a determination that you are victim of human trafficking made by a Federal, State, or Tribal, governmental entity; or (2) a determination by a non-governmental entity or task force authorized by a governmental agency to make a human trafficking determination; or (3) a self-attestation signed or certified by a representative authorized by an entity described in 1 or 2 in this paragraph; or (4) a determination by court in a case where a central issue is, whether you are a victim of human trafficking (which could be made up of several documents from the court case that together show that the court accepted as true or found no genuine dispute that you were a victim of human trafficking).

So that we can complete processing your request, you need to please contact us as quickly as possible to provide the above additional information. You may mail the information to us at P.O. Box 105874, Atlanta GA 30348 or you may call us toll free at (833) 240-3461 for more information and to learn about other ways to promptly send us the requested documents. If you contact us by mail, please include a copy of this letter or provide the confirmation number with your submission.

We are required to resolve your request within 25 business days of when we receive it, but we need the above required documentation. However, if we do not receive the necessary documents in time to meet the deadline, we will have to decline and close your request. If that happens, we will notify you, and you may resubmit your request with the necessary information and documents.

We look forward to hearing from you to complete your request or answer questions that you may have.

Thank you for the opportunity to assist you.

Equifax Information Services LLC

00003461 03461 0001-0001 DEC20000061424136674 00 L 00009511

Date: January 17, 2024

GREGORY ST CLAIR  
2104 WATERLEAF WAY  
BOWIE, MD 20721-2275

Experian  
P.O. Box 4500  
Allen, TX 75013

*Sample of what  
I send to Experian  
Experian*

**Subject:** Self-Attested Request for Blocking of Adverse Information under Regulation V

Dear EXPERIAN,

I hope this letter finds you well. I am writing to you as a victim of severe trafficking in persons, and I am seeking assistance in compliance with Regulation V, specifically § 1022.142, which addresses the prohibition on including adverse information in consumer reports for individuals like me who have experienced this severe form of trafficking.

#### **SELF ATTESTATION**

I, Gregory St Clair, attest that I am a victim of severe trafficking in persons, and I have attached the necessary trafficking documentation, as defined under Regulation V § 1022.142(b)(6), to this letter, confirming my status as a trafficking victim.

#### **CRA NOTICE OF LAW**

Under Regulation V § 1022.142(c), it is clear that a consumer reporting agency may not furnish a consumer report containing any adverse item of information about a consumer that resulted from a severe form of trafficking in persons if the consumer has provided trafficking documentation to the consumer reporting agency. In light of this regulation, I kindly request that you promptly take action to block the adverse information that is currently included in my consumer report.

#### **ADVERSE ITEMS OF INFORMATION IDENTIFICATION:**

Below is a list of the accounts and information that I am requesting to be blocked:

#### **ACCOUNTS:**

1. CITIZENS PAY CREDIT LI - 605830XXXXXXXXXX

**INQUIRES:**

1. CAP ONE NA- Date of inquiry Jul 25, 2023

I attest that the adverse information included in my consumer report is causing me significant distress and further harm. I believe that this blocking request is a crucial step in protecting my rights and privacy as a victim of trafficking.

I understand that Regulation V § 1022.142 requires you to block this information within four business days upon receiving the required trafficking documentation. I kindly request that you adhere to this timeline and provide me with written confirmation once the adverse information has blocked from my consumer report.

Due to significant privacy and data security issues, we request that the Bureau refrains from notifying the mentioned furnishers of the purpose behind the requested blocks. This precaution is necessary to prevent the information from potentially reaching my trafficker and jeopardizing my safety. This request is made in accordance with Regulation V (12 CFR § 1022.82). Your understanding and cooperation in this matter are highly appreciated

Your prompt attention to this matter is greatly appreciated. If you require any additional documentation or information to expedite this process, please do not hesitate to contact me at socialtaxx@gmail.com.

I trust that you will treat this request with the utmost urgency and professionalism, in accordance with the applicable regulations.

Thank you for your cooperation and assistance in this important matter.

Sincerely,

By: \_\_\_\_\_

**Gregory St Clair All rights reserved UCC 1-308**

**ENCLOSURES:**

- Trafficking Documentation/ Certification
- Driver License
- Copy of SSN

- Utility Bill / Bank Statement

**NOTARY ACKNOWLEDGMENT**

State of \_\_\_\_\_

County of \_\_\_\_\_

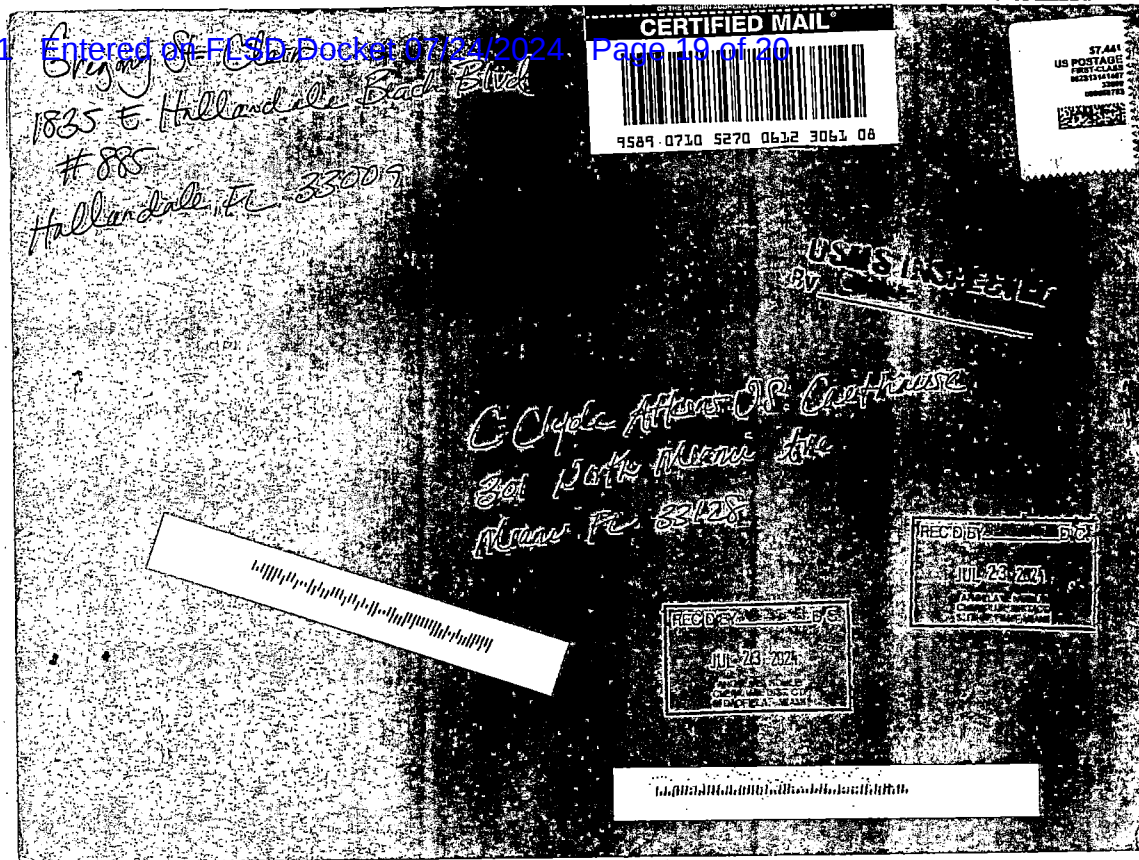
I, \_\_\_\_\_, certify that I know or have satisfactory evidence that **Gregory St Clair** is the person who appeared before me, and said person acknowledged that he signed this self-attestation and acknowledged it to be his free and voluntary act for the uses and purposes mentioned in the instrument.

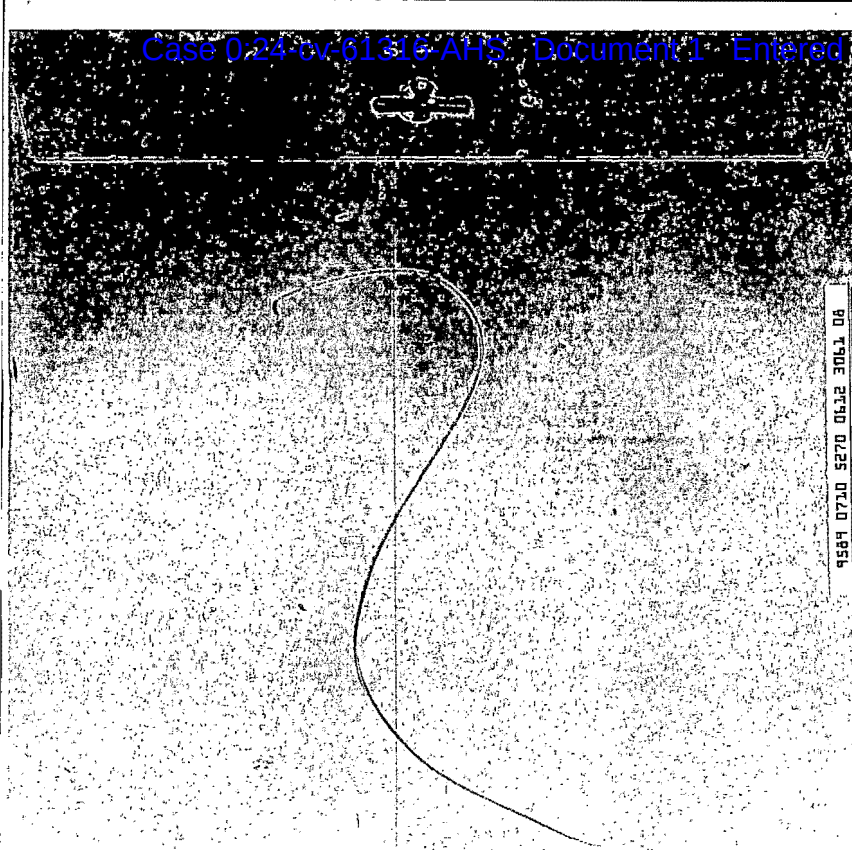
By: \_\_\_\_\_ Dated: \_\_\_\_\_

My Appointment Expires: \_\_\_\_\_ (Seal or Stamp)

**\*\*NGO TRAFFICKING CERTIFICATON ATTACHED\*\***







9534 0710 5270 0632 3061 08